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May 12, 2025

Via ECF
Hon. Joseph A. Marutollo, U.S.M.J.
United States District Court, Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

> **Re: Trustees of the Plumbers Local Union No. 1 Welfare Fund, Trade Education Fund, and 401(k) Savings Plan et al v. Metro City Group, Inc., et. al.**
> **Case No.: 1:25-cv-01352-JAM**

Dear Judge Marutollo:

We represent Hanover Insurance Company in this matter. We write in response to the Court's May 9, 2025 Text Order (issued at 3:13 p.m.), which directed that Hanover answer or otherwise respond to the Complaint by May 12, 2025.

It appears this Order was issued prior to the Court's receipt of Plaintiff's counsel's letter, also dated May 9, in which counsel requested an extension of each Defendants' time to respond to the Complaint to June 19, 2025 [ECF 11]. It is our understanding that the Court's Order directing Hanover to respond to the Complaint by May 12 was superseded by the Court's subsequent Text Order, issued on May 9 at 3:17 p.m. which directed the parties to file notices of appearance by May 13, adjourned *sine die* the May 20 initial conference, and directed the parties to file a joint status report by May 20. We also assume that counsel's request to extend the Defendants' time to respond to the complaint was granted. Accordingly, we will file today a Notice of Appearance for Hanover, and coordinate with the other parties the submission of the joint status report.

If, however, our reading of the latter Text Order is incorrect, such that the Court requires that Hanover respond to the Complaint today, we respectfully request that the Court advise so that we can file an answer today if necessary.

Thank you for your attention to this matter.

Respectfully,

Katherine M. Coyne
KATHERINE M. COYNE

cc: Adrianna Grancio, Esq. (via ECF)
       Justin Schwamb, Esq. (via email)
       Mr. Stuart Overton (via email)

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